

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE VALEANT
PHARMACEUTICALS
INTERNATIONAL, INC.
SECURITIES LITIGATION

THIS DOCUMENT RELATES TO
ALL CASES

Master No.: 3:15-cv-07658-MAS-LHG

**JOINT STIPULATION AND
[PROPOSED] ORDER RE:
DISCOVERY AND SCHEDULE IN
SECURITIES CLASS ACTION
AND OPT-OUT LITIGATIONS**

WHEREAS, the Parties have conferred regarding discovery and the case schedule in the Securities Class Action and Opt-Out Litigations (collectively, “the Actions”), in light of developments in the Actions since the Special Master entered the March 18, 2020 Joint Stipulation and Order re: Discovery and Schedule in Securities Class Action and Opt-Out Litigations (the “March 18, 2020 Order”) (ECF 529);

WHEREAS, the Parties have reached certain agreements memorialized below regarding the modification of the dates set forth in the March 18, 2020 Order, but reserve all rights and arguments concerning discovery, coordination, any actual or potential stay of discovery, and the schedule in the Securities Class Action and the Opt-Out Litigations;

WHEREAS, in the Securities Class Action (15-cv-07658) the sole remaining defendant PricewaterhouseCoopers LLP (“PwC”) moved pursuant to Rule 12(c) for judgment on the pleadings regarding the Section 11 claim by named plaintiff, the City of Tucson on behalf of the Tucson Supplemental Retirement System (“Tucson”); the Special Master has issued a report recommending denial of that motion (ECF No. 563); and the Parties to the Securities Class Action have fully briefed PwC’s objection to that report and recommendation (ECF Nos. 573, 574, 588, 589, 591) and await Judge Shipp’s ruling;

WHEREAS, in the Securities Class Action (15-cv-07658), Tucson moved for leave to amend its complaint to assert a Section 10(b) fraud claim against PwC; the Special Master has issued a report recommending that the motion be granted (ECF No. 602); the Parties to the Securities Class Action have fully briefed PwC’s objection to that report and recommendation (ECF Nos. 609, 610, 613, 615, 618, 620) and await Judge Shipp’s ruling; and PwC has indicated its intent to move to dismiss the proposed Section 10(b) claim in the event that Judge Shipp allows the amendment (ECF 609, at 24);

WHEREAS, the Special Master has set another scheduling conference for December 2, 2020 (the “Next Conference”);

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of the Parties, that:

(a) The following Amended Proposed Joint Discovery Plan, which modifies the schedule contained in the March 18, 2020 Order (ECF 529), shall apply to the Securities Class Action and the Opt-Out Litigations, subject to the provisions set forth in paragraphs (b) – (i) below:

Action	Proposed Dates
Deadline for service of all interrogatories, requests for admission, and requests for production	March 5, 2021
Fact Discovery Cutoff	May 4, 2021
Deadline to serve affirmative expert reports	May 28, 2021
Deadline to serve rebuttal expert reports	July 28, 2021
Deadline to serve reply expert reports	August 25, 2021
Expert Discovery Cutoff	September 29, 2021
Deadline to file Dispositive Motion(s)	October 27, 2021
Deadline to file Opposition(s) to Dispositive Motion(s)	December 15, 2021
Deadline to file Reply in support of Dispositive Motion(s)	January 10, 2022
Deadline for objection(s) to proposed expert testimony under FRE 702	90 days before the final pretrial conference
Opposition to any objection(s) to proposed expert testimony under FRE 702	60 days before the final pretrial conference
Reply in support of any objection(s) to proposed expert testimony under FRE 702	30 days before the final pretrial conference
Deadline for parties to designate potential trial witnesses and proposed exhibits	45 days before the final pretrial conference

Action	Proposed Dates
Deadline for parties to file a joint set of jury instructions, proposed jury instructions which are objected to by any other party and points and authorities in support of and in opposition to the objected to instructions	45 days before the final pretrial conference
Final Pretrial Conference	TBD
Proposed Trial Date	TBD

(b) The Parties shall meet and confer in advance of the Next Conference concerning discovery, coordination, any stay of discovery in any of the actions, class certification briefing and discovery, and the schedule in the Securities Class Action and the Opt-Out Litigations;

(c) All discovery by PwC and Tucson and all discovery directed to PwC and Tucson in any capacity (as party or non-party, and including their current or former partners, employees, officers, investment advisors, subadvisors, and directors) shall be stayed for the time being. The Parties will meet and confer concerning whether this stay continues or ends in the Securities Class Action and/or the Opt-Out Litigations no later than the earlier of (i) the date of the Next Conference (December 2, 2020) or (ii) three business days after Judge Shipp has ruled on both PwC's Rule 12(c) motion for judgment on the pleadings regarding the Section 11 claim and Tucson's motion for leave to amend its complaint. If after meeting and conferring the Parties disagree on whether the stay should continue or end in the

Securities Class Action and/or the Opt-Out Litigations, they shall raise the issue with the Special Master. In that event, until the Special Master resolves the issue, the stay shall remain in effect;

(d) Subject to the stay set forth in paragraph (c), fact depositions of Parties and non-parties to the Opt-Out Litigations may commence;

(e) PwC and Tucson may participate in the depositions referenced in paragraph (d) and examine witnesses, but PwC and Tucson may not notice or subpoena depositions while the stay is in effect;

(f) Subject to the stay set forth in paragraph (c), document discovery and other written discovery of Parties and non-parties to the Opt-Out Litigations shall proceed;

(g) PwC and Tucson may receive copies of documents produced in response to the document discovery referenced in paragraph (f), but PwC and Tucson may not serve discovery or subpoena documents while the stay is in effect¹;

(h) Nothing in this Stipulation and Proposed Order shall limit the ability of the Parties in the Opt-Out Litigations to seek depositions of, and documents from,

¹ If Tucson or PwC believes it cannot meaningfully participate in a deposition described in paragraph (d) without obtaining additional documents, they shall meet and confer regarding whether one or both of them may initiate discovery to obtain such documents, and any dispute shall be promptly submitted to the Special Master for resolution.

the Parties subject to the stay discussed in paragraph (a) after that stay is lifted, and the Parties subject to that stay reserve their rights to object to such discovery; and

(i) Nothing in this Stipulation and Proposed Order is intended to modify the Court's October 12, 2018 coordination order or preclude the Parties from later seeking modification of that Order.

DATED: October 13, 2020

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